

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

JUN 03 2020

JAMES W. McCORMACK, CLERK  
By: [Signature]  
PLAINTIFFS DEF CLERK

**BRANDON WARD, TERRANCE BANKS,  
CARLOS BOZEMAN, ARCH CHILDERS, IDA  
EALY, CHRISTOPHER FITZHUGH, BYRON  
GILLESPIE, DARIN MCNEIL, LEWIS PAFFORD,  
RENO ROBINSON, SHAN RUSS, TOMMY  
SMITH, DAVID STILLIS, ZACK TAYLOR,  
TARRELL THOMPSON, TRE WASHINGTON,  
MARTELL WILBON, SCOTTIE WILSON and  
BOBBY YOUNG, Each Individually and on  
Behalf of All Others Similarly Situated**

This case assigned to District Judge Wilson  
and to Magistrate Judge Deere

vs.

No. 4:20-cv- 704-BRW

**WELSPUN PIPES, INC., WELSPUN  
TUBULAR, LLC, and WELSPUN USA, INC.**

**DEFENDANTS**

**ORIGINAL COMPLAINT—COLLECTIVE ACTION**

COME NOW Plaintiffs Brandon Ward, Terrance Banks, Carlos Bozeman, Arch Childers, Ida Ealy, Christopher Fitzhugh, Byron Gillespie, Darin Mcneil, Lewis Pafford, Reno Robinson, Shan Russ, Tommy Smith, David Stills, Zack Taylor, Tarrell Thompson, Tre Washington, Martell Wilbon, Scottie Wilson, and Bobby Young (collectively "Plaintiffs"), each individually and on behalf of all others similarly situated, by and through their attorneys Daniel Ford and Josh Sanford of Sanford Law Firm, PLLC, and for their Original Complaint—Collective Action against Defendants Welspun Pipes, Inc., Welspun Tubular LLC, and Welspun USA Inc (collectively "Defendant" or "Defendants"), they do hereby state and allege as follows:

## **I. PRELIMINARY STATEMENTS**

1. This is a class action and a collective action brought by Plaintiffs, each individually and on behalf of all other hourly-paid employees employed by Defendants at any time within a three-year period preceding the filing of this Complaint.

2. Plaintiffs bring this action under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* ("FLSA"), and the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* ("AMWA"), for declaratory judgment, monetary damages, liquidated damages, prejudgment interest, and costs, including reasonable attorneys' fees, as a result of Defendants' failure to pay Plaintiffs and other hourly-paid employees lawful overtime compensation for hours worked in excess of forty (40) hours per week.

3. Upon information and belief, for at least three (3) years prior to the filing of this Complaint, Defendants have willfully and intentionally committed violations of the FLSA and AMWA as described, *infra*.

## **II. JURISDICTION AND VENUE**

4. The United States District Court for the Eastern District of Arkansas has subject matter jurisdiction over this suit under the provisions of 28 U.S.C. § 1331 because this suit raises federal questions under the FLSA.

5. Plaintiffs' claims under the AMWA form part of the same case or controversy and arise out of the same facts as the FLSA claims alleged in this Complaint. Therefore, this Court has supplemental jurisdiction over Plaintiffs' AMWA claims pursuant to 28 U.S.C. § 1367(a).

6. The acts complained of herein were committed and had their principal effect within the Central Division of the Eastern District of Arkansas; therefore, venue is proper within this District pursuant to 28 U.S.C. § 1391.

7. Defendants do business in this District and a substantial part of the events alleged herein occurred in this District.

8. The witnesses to overtime wage violations alleged in this Complaint reside in this District.

9. The payroll records and other documents related to the payroll practices that Plaintiffs challenge are located in this District.

### **III. THE PARTIES**

10. Plaintiffs are all residents and citizens of the State of Arkansas.

11. Defendant Welspun Pipes, Inc., is a foreign, for-profit corporation, registered to do business in the State of Arkansas.

12. Defendant Welspun Pipes, Inc.'s registered agent for service of process in Arkansas is Rajesh Chokhani, at 9301 Frazier Pike, Little Rock, Arkansas 72206.

13. Defendant Welspun Tubular, LLC, is a foreign limited liability company, registered to do business in the State of Arkansas.

14. Defendant Welspun Tubular, LLC's registered agent for service of process in Arkansas is Rajesh Chokhani, at 9301 Frazier Pike, Little Rock, Arkansas 72206.

15. Defendant Welspun USA Inc is a foreign, for-profit corporation, registered to do business in the State of Arkansas.

16. Defendant Welspun USA Inc's registered agent for service of process in Arkansas is the Corporation Service Company, 300 Spring Building, Suite 900, 300 South Spring Street, Little Rock, Arkansas 72201.

#### **IV. FACTUAL ALLEGATIONS**

17. Plaintiffs repeat and re-allege all the preceding paragraphs of this Original Complaint as if fully set forth in this section.

18. Defendant Welspun Pipes, Inc., is an “employer” within the meanings set forth in the FLSA and AMWA, and was, at all times relevant to the allegations in this Complaint, Plaintiffs’ employer, as well as the employer of the members of the class and collective.

19. Defendant Welspun Pipes, Inc., is a leading supplier of various types of pipes to the oil and gas industry, producing Longitudinal, Spiral and HFERW/HFIW pipes to create pipelines for various oil and gas companies around the world.

20. Defendant Welspun Pipes, Inc., operates multiple manufacturing facilities worldwide, including a facility in Arkansas, and has one corporate headquarters that centralizes all pay, time and human resource policies so that they are the same across its facilities.

21. During the time period relevant to this case, Plaintiffs were employed at Defendant Welspun Pipes, Inc.’s manufacturing facility in Little Rock.

22. Defendant Welspun Pipes, Inc., has employees engaged in commerce and has employees handling or otherwise working on goods or materials that have been moved in or produced for commerce by others, such as raw material used to manufacture wind blades, machinery and tools.

23. Defendant Welspun Pipes, Inc.'s annual gross volume of sales made or business done is not less than \$500,000.00 (exclusive of excise taxes at the retail level that are separately stated) for each of the three years preceding the filing of this Complaint.

24. Defendant Welspun Tubular LLC is an "employer" within the meanings set forth in the FLSA and AMWA, and was, at all times relevant to the allegations in this Complaint, Plaintiffs' employer, as well as the employer of the members of the class and collective.

25. Defendant Welspun Tubular LLC is a leading supplier of various types of pipes to the oil and gas industry, producing Longitudinal, Spiral and HFERW/HFIW pipes to create pipelines for various oil and gas companies around the world.

26. Defendant Welspun Tubular LLC operates multiple manufacturing facilities worldwide, including a facility in Arkansas, and has one corporate headquarters that centralizes all pay, time and human resource policies so that they are the same across its facilities.

27. During the time period relevant to this case, Plaintiffs were employed at Defendant Welspun Tubular, LLC's manufacturing facility in Little Rock.

28. Defendant Welspun Tubular LLC has employees engaged in commerce and has employees handling or otherwise working on goods or materials that have been moved in or produced for commerce by others, such as raw material used to manufacture wind blades, machinery and tools.

29. Defendant Welspun Tubular LLC's annual gross volume of sales made or business done is not less than \$500,000.00 (exclusive of excise taxes at the retail level

that are separately stated) for each of the three years preceding the filing of this Complaint.

30. Defendant Welspun USA Inc is an “employer” within the meanings set forth in the FLSA and AMWA, and was, at all times relevant to the allegations in this Complaint, Plaintiffs’ employer, as well as the employer of the members of the class and collective.

31. Defendant Welspun USA, Inc., is a leading supplier of various types of pipes to the oil and gas industry, producing Longitudinal, Spiral and HFERW/HFIW pipes to create pipelines for various oil and gas companies around the world.

32. Defendant Welspun USA, Inc., operates multiple manufacturing facilities worldwide, including a facility in Arkansas, and has one corporate headquarters that centralizes all pay, time and human resource policies so that they are the same across its facilities.

33. During the time period relevant to this case, Plaintiffs were employed at Defendant Welspun USA, Inc.’s manufacturing facility in Little Rock.

34. Defendant Welspun USA, Inc., has employees engaged in commerce and has employees handling or otherwise working on goods or materials that have been moved in or produced for commerce by others, such as raw material used to manufacture wind blades, machinery and tools.

35. Defendant Welspun USA, Inc.’s annual gross volume of sales made or business done is not less than \$500,000.00 (exclusive of excise taxes at the retail level that are separately stated) for each of the three years preceding the filing of this Complaint.

36. Defendant's Welspun Pipes, Inc., Welspun Tubular, LLC, and Welspun USA, Inc., jointly operate the manufacturing facility at which Plaintiffs and other potential collective and class members were employed.

37. Defendants, together, have unified control over employees and jointly exercise authority over Plaintiffs and other employees, set the pay policy applicable to Plaintiffs and other employees and control the work schedule of Plaintiffs and other employees.

38. At all material times, Plaintiffs have been entitled to the rights, protection and benefits provided under the FLSA and the AMWA.

39. During the three (3) years prior to the filing of this lawsuit, each Plaintiff worked for Defendants as an hourly-paid employee.

40. Plaintiffs and other hourly-paid employees regularly worked in excess of forty (40) hours per week throughout their tenure with Defendants.

41. Plaintiffs and other hourly-paid employees were classified as hourly employees and paid an hourly rate.

42. Plaintiffs and other hourly-paid employees recorded their hours worked via an electronic time clock, which logged their hours into a payroll system maintained by Defendants.

43. The payroll system used by Defendants rounded hours worked by Plaintiffs and other hourly-paid employees in favor of Defendants.

44. For example, if an hourly-paid employee clocked in at 8:15 am, the payroll system recorded his or her start time as 8:30 am. Likewise, if an hourly-paid employee

clocked out at 5:15 pm, Defendants' payroll system recorded his or her end time as 5:00 pm.

45. The rounding in Defendants' time keeping system resulted in several hours of unpaid work each month for Plaintiffs and other hourly-paid employees.

46. Plaintiffs worked for Defendants at Defendants' facility in Little Rock (hereinafter the "Little Rock facility") and Defendants' pay practices were the same for all hourly workers at the Little Rock facility.

47. The pay practices that violate the FLSA and AMWA alleged herein was a centralized human resources policy implemented uniformly from Defendants' corporate headquarters.

48. Defendants knew, or showed reckless disregard for whether, the way they paid Plaintiffs and other hourly-paid employees violated the FLSA and AMWA.

49. Defendants' hourly-paid employees were classic manual laborers, working with machinery and equipment to produce Defendants' products in a factory setting.

## **V. REPRESENTATIVE ACTION ALLEGATIONS**

50. Plaintiffs repeat and re-allege all the preceding paragraphs of this Original Complaint as if fully set forth in this section.

51. Plaintiffs bring this claim for relief for violation of the FLSA as a collective action pursuant to Section 16(b) of the FLSA, 29 U.S.C. § 216(b).

52. Plaintiffs bring their FLSA claims on behalf of all hourly-paid employees employed by Defendants at any time within the applicable statute of limitations period, who were classified by Defendants as non-exempt from the overtime requirements of the FLSA and who are entitled to payment of the following types of damages:



A. Payment for all hours worked, including payment of a lawful overtime premium for all hours worked for Defendants in excess of forty (40) hours in a workweek; and

B. Liquidated damages; and

C. Attorneys' fees and costs.

53. The relevant time period dates back three years from the date on which Plaintiffs' Original Complaint—Class and Collective Action was filed and continues forward through the date of judgment pursuant to 29 U.S.C. § 255(a).

54. The members of the proposed FLSA Collective are similarly situated in that they share these traits:

A. They were classified by Defendants as non-exempt from the overtime requirements of the FLSA;

B. They were paid hourly rates;

C. They recorded their time in the same manner; and

D. They were subject to Defendants' common policy of rounding time worked in Defendants' favor.

55. Plaintiffs are unable to state the exact number of the potential members of the FLSA Collective but believe that the group exceeds 500 persons.

56. Defendants can readily identify the members of the Section 16(b) Collective. The names, physical addresses, electronic mailing addresses and phone numbers of the FLSA collective action plaintiffs are available from Defendants, and a Court-approved Notice should be provided to the FLSA collective action plaintiffs via first class mail, email and text message to their last known physical and electronic

mailing addresses and cell phone numbers as soon as possible, together with other documents and information descriptive of Plaintiff's FLSA claim.

**VI. FIRST CLAIM FOR RELIEF  
(Individual Claims for Violation of FLSA)**

57. Plaintiffs repeat and re-allege all the preceding paragraphs of this Complaint as if fully set forth in this section.

58. 29 U.S.C. §§ 206 and 207 require any enterprise engaged in commerce to pay all employees a minimum wage for all hours worked up to forty (40) in one week and to pay time and a half of regular wages for all hours worked over forty (40) hours in a week, unless an employee meets certain exemption requirements of 29 U.S.C. § 213 and all accompanying Department of Labor regulations.

59. During the period relevant to this lawsuit, Defendants classified Plaintiffs as non-exempt from the overtime requirements of the FLSA.

60. Despite the entitlement of Plaintiffs to overtime payments under the FLSA, Defendants failed to pay Plaintiffs an overtime rate of one and one-half times their regular rate of pay for all hours worked over forty (40) in each one-week period.

61. Defendants' failure to properly pay overtime wages to Plaintiffs stems from Defendants' acts of illegally rounding hours worked in Defendants' favor and not paying Plaintiffs for all hours worked.

62. Defendants' conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

63. By reason of the unlawful acts alleged in this Complaint, Defendants are liable to Plaintiffs for, and Plaintiffs seek, unpaid overtime wages, liquidated damages, and costs, including reasonable attorney's fees as provided by the FLSA.

64. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiffs as provided by the FLSA, Plaintiffs are entitled to an award of prejudgment interest at the applicable legal rate.

**VII. SECOND CLAIM FOR RELIEF  
(Collective Action Claim for Violation of FLSA)**

65. Plaintiffs repeat and re-allege all the preceding paragraphs of this Original Complaint as if fully set forth in this section.

66. Plaintiffs bring this collective action on behalf of all hourly-paid workers employed by Defendants to recover monetary damages owed by Defendants to Plaintiffs and members of the putative collective for all the overtime compensation for all the hours they worked in excess of forty (40) each week.

67. Plaintiffs bring this action on behalf of themselves individually and all other similarly situated employees, former and present, who were and/or are affected by Defendants' willful and intentional violation of the FLSA.

68. 29 U.S.C. § 207 requires employers to pay employees 1.5x the employee's regular rate for all hours that the employee works in excess of 40 per week.

69. In the past three years, Defendants have employed hundreds of hourly-paid employees.

70. Like Plaintiffs, these hourly-paid employees regularly worked more than 40 hours in a week.

71. Defendants failed to pay these workers at the proper overtime rate.

72. Because these employees are similarly situated to Plaintiffs, and are owed overtime for the same reasons, the opt-in class may be properly defined as:

**Each hourly employee within the three years preceding the filing of this Complaint who worked more than thirty-nine (39) hours in any week.**

73. Defendants' conduct and practice, as described above, has been and is willful, intentional, unreasonable, arbitrary and in bad faith.

74. By reason of the unlawful acts alleged in this Complaint, Defendants are liable to Plaintiffs and all those similarly situated for, and Plaintiffs and all those similarly situated seek, unpaid overtime wages, liquidated damages, and costs, including reasonable attorney's fees as provided by the FLSA.

75. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiffs and all those similarly situated as provided by the FLSA, Plaintiffs and all those similarly situated are entitled to an award of prejudgment interest at the applicable legal rate.

**VIII. THIRD CLAIM FOR RELIEF  
(Individual Claims for Violation of the AMWA)**

76. Plaintiffs repeat and re-allege all previous paragraphs of this Original Complaint as though fully incorporated in this section.

77. Plaintiffs assert this claim for damages and declaratory relief pursuant to the AMWA, Arkansas Code Annotated §§ 11-4-201, *et seq.*

78. At all relevant times, Defendants were Plaintiffs' "employer" within the meaning of the AMWA, Ark. Code Ann. § 11-4-203(4).

79. Arkansas Code Annotated § 11-4-211 requires employers to pay all employees one and one-half times regular wages for all hours worked over forty (40) hours in a week, unless an employee meets the exemption requirements of 29 U.S.C. § 213 and accompanying Department of Labor regulations.

80. Defendants rounding practices resulted in failing to pay Plaintiffs all overtime wages owed, as required under the AMWA.

81. Defendants' conduct and practices, as described above, were willful, intentional, unreasonable, arbitrary and in bad faith.

82. By reason of the unlawful acts alleged in this Complaint, Defendants are liable to Plaintiffs for monetary damages, liquidated damages, costs, and a reasonable attorney's fee provided by the AMWA for all violations which occurred beginning at least three (3) years preceding the filing of Plaintiffs' initial complaint, plus periods of equitable tolling.

83. Alternatively, should the Court find that Defendants acted in good faith in failing to pay Plaintiffs as provided by the AMWA, Plaintiffs are entitled to an award of prejudgment interest at the applicable legal rate.

#### **IX. PRAYER FOR RELIEF**

WHEREFORE, premises considered, Plaintiffs Brandon Ward, Terrance Banks, Carlos Bozeman, Arch Childers, Ida Ealy, Christopher Fitzhugh, Byron Gillespie, Darin Mcneil, Lewis Pafford, Reno Robinson, Shan Russ, Tommy Smith, David Stills, Zack Taylor, Tarrell Thompson, Tre Washington, Martell Wilbon, Scottie Wilson and Bobby Young respectfully pray that Defendants be summoned to appear and to answer herein as follows:

A. That Defendants be required to account to Plaintiffs, the class and collective members, and the Court for all of the hours worked by Plaintiffs and the class and collective members and all monies paid to them;

B. A declaratory judgment that Defendants' practices violate the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations at 29 C.F.R. § 516, *et seq.*;

C. A declaratory judgment that Defendants' practices violate the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.*, and the related regulations;

D. Certification of, and proper notice to, together with an opportunity to participate in the litigation, all qualifying current and former employees;

E. Judgment for damages for all unpaid overtime compensation under the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations at 29 C.F.R. § 516, *et seq.*;

F. Judgment for damages for all unpaid overtime compensation under the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.* and the related regulations;

G. Judgment for liquidated damages pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and attendant regulations at 29 C.F.R. § 516, *et seq.*, in an amount equal to all unpaid overtime compensation owed to Plaintiffs and members of the collective during the applicable statutory period;

H. Judgment for liquidated damages pursuant to the Arkansas Minimum Wage Act, Ark. Code Ann. § 11-4-201, *et seq.*, and the relating regulations in an amount equal to all unpaid overtime compensation owed to Plaintiffs and members of the collective during the applicable statutory period;

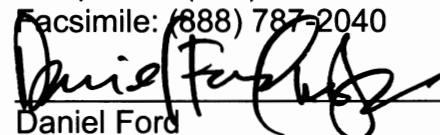
I. An order directing Defendants to pay Plaintiffs and members of the collective pre-judgment interest, reasonable attorney's fees and all costs connected with this action; and

J. Such other and further relief as this Court may deem just and proper.

Respectfully submitted,

**BRANDON WARD, TERRANCE BANKS,  
CARLOS BOZEMAN, ARCH CHILDERS,  
IDA EALY, CHRISTOPHER FITZHUGH,  
BYRON GILLESPIE, DARIN MCNEIL,  
LEWIS PAFFORD, RENO ROBINSON,  
SHAN RUSS, TOMMY SMITH, DAVID  
STILLS, ZACK TAYLOR, TARRELL  
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Josh Sanford  
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[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

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**PLAINTIFFS**

vs.

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**DEFENDANTS**

**CONSENT TO JOIN COLLECTIVE ACTION**

I was employed as an hourly worker for Welspun Pipes, Inc., Welspun Tubular, LLC, and Welspun USA, Inc., within the past three (3) years. I understand this lawsuit is being brought under the Fair Labor Standards Act for unpaid overtime wages. I consent to becoming a party-plaintiff in this lawsuit, to be represented by Sanford Law Firm, PLLC, and to be bound by any settlement of this action or adjudication by the Court.



**TERRANCE BANKS**

June 3, 2020

**Josh Sanford, Esq.  
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One Financial Center  
650 South Shackleford Road, Suite 411  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040  
josh@sanfordlawfirm.com**



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**CHRISTOPHER FITZHUGH**  
June 3, 2020

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*Carlos Bozeman*

**CARLOS BOZEMAN**

June 3, 2020

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**BRANDON WARD**  
June 3, 2020

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**ARCH CHILDERS**

June 3, 2020

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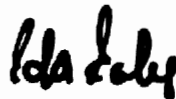
No. 4:20-cv-\_\_\_\_\_

**WELSPUN PIPES, INC., WELSPUN  
TUBULAR, LLC, and WELSPUN USA, INC.**

**DEFENDANTS**

**CONSENT TO JOIN COLLECTIVE ACTION**

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**IDA EALY**

June 3, 2020

**Josh Sanford, Esq.  
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josh@sanfordlawfirm.com**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**BRANDON WARD, TERRANCE BANKS,  
CARLOS BOZEMAN, ARCH CHILDERS, IDA  
EALY, CHRISTOPHER FITZHUGH, BYRON  
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**BYRON GILLESPIE**

June 3, 2020

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**DARIN McNEIL**  
June 3, 2020

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**LEWIS PAFFORD**

June 3, 2020

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**RENO ROBINSON**

June 3, 2020

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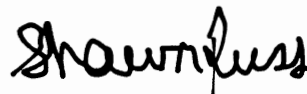
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**SHAN RUSS**

June 3, 2020

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*Tommy Smith*

**TOMMY SMITH**

June 3, 2020

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**DAVID STILLS**

June 3, 2020

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\_\_\_\_\_  
**ZACK TAYLOR**

June 3, 2020

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**MARTELL WILBON**

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